

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**VICTIM RIGHTS LAW CENTER** *et al.*,

Plaintiffs,

v.

**ELISABETH D. DEVOS**, in her official  
capacity as Secretary of Education *et al.*,

Defendants.

Case Number: 1:20-cv-11104

**UNOPPOSED MOTION FOR  
LEAVE TO FILE EXHIBIT UNDER  
SEAL**

Pursuant to Local Rule 7.2, Plaintiffs move for an order granting leave to file under seal Exhibit A to Plaintiff Mary Doe's Supplemental Declaration. Exhibit A is the Student Handbook at Mary Doe's college, which was revised as of August 2020. Mary Doe's declaration references the provision titled Gender Discrimination & Harassment, Sexual Misconduct & Harassment, Stalking, and Intimate Partner Violence (pages 84-115) as indicative of her college's interpretation and application of Defendants' Final Rule.

As grounds for filing under seal, Plaintiffs state that this document reveals the name of Mary Doe's college. Because Mary Doe attends a college with a small student population, the public filing of the Student Handbook naming her college makes it highly likely that Mary Doe's identity would be revealed through this litigation, and that she would subsequently be subject to further harassment and retaliation. Pursuant to the Court's standing order regarding sealing court documents, Plaintiffs also submit the affidavit of Natalie Fleming Nolen in support of this motion.

Plaintiffs believe it important for the Court to review this document in connection with

the Mary Doe Supplemental Declaration, and given the Court's request for this policy (ECF No. 154), Plaintiffs respectfully request that the Court grant leave to file this document under seal.

Dated: February 5, 2021

Respectfully submitted,

By: /s/ Evan M. Harris

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**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I hereby certify that I conferred with counsel for Defendants on the foregoing motion, and there was no opposition.

/s/ Evan M. Harris

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Evan M. Harris

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this **UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**, was served this day on all parties via the Court's electronic case filing system.

Date: February 5, 2021

/s/ Evan M. Harris